
Exhibit 1

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April 5, 2024

VIA EMAIL

James Bonner
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Hackensack, NJ 07601

Re: *Pam/Miller v. Arab Bank*

Counsel:

In preparing for the upcoming *Pam* and *Miller* depositions, we have several questions concerning the Plaintiffs' electronically stored information ("ESI") production. Specifically, some Plaintiffs have produced text messages, some Plaintiffs have produced WhatsApp messages, some Plaintiffs have produced certain social media information, and some Plaintiffs have produced no ESI at all. While we agreed on the search terms Plaintiffs used to conduct searches, the Plaintiffs did not provide the sources of ESI or data that they searched. Accordingly, in order for us to better understand the Plaintiffs' search protocol, we ask that you please provide for each Plaintiff: (1) how sources of ESI were identified; (2) the sources of ESI that were considered for searching (e.g., computers, mail servers, text messages, WhatsApp, particular social media accounts); (3) the sources that were ultimately searched; (4) an explanation of how each data source was obtained and searched (e.g., preservation and collection methodology, processing specifications, search tools or review platforms); (5) an explanation of any sources of data that were no longer available for searching; and (6) an explanation for why any available identified sources were not searched.

We ask that you provide this information for the *Pam* Plaintiffs scheduled to be deposed in Israel in May no later than April 15, 2024, and the remaining information by May 1, 2024. We then would like to have a meet and confer with your IT consultant to better understand what was searched and how it was searched.

Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "BIM", is positioned above the printed name.

Brett Ingerman

cc: All counsel (via email)